

State of South Carolina
IN the Court of Appeal

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JUN 26 2023

SC Court of Appeals

Appeal From Horry County

Honorable R. Ferrell Cothran Jr

Honorable William H. Seal Jr

Honorable H. Bruce Williams

Honorable John D. Geathers

Appeal Case No. 2021-001271

Jamie Goss

Appellant

VS

The State

Respondent

Motion 59(e) and 60(a) In respond to
order filed June 9 2023

I received order on June 13 2023 denying Appellant Opposition to Initial Brief of Respondent Motion and Designation" of matter which is question of law and a matter of Investorgate It is exactly this type of conflict of interest that create extraordinary circumstances within it's political sub-division because I'm being discrimination due to the following Issues

Issue one

Default Judgment was file in the court of appeal; with this same Initial brief and designation of matter which is question of law because to many ~~extension~~. The court file this motion and some how I never received nothing from this motion untile, the order to construe as a motion to strike, which violates due process. S.C. Const. Art 1 section 22

Issue two

The record would reflect the Care Act is preserved; Care Act in the transcript.

Issue three

The motion was filed in the appropriate court, Common Pleas. for extraordinary circumstances.

Issue four

Recorded on appeal for the following reason for incomplete transcript which the court reporter could not hear me during court hearing. She refund money because something was wrong with the mic. Mean all issues is preserved

Issue Five

Gov. McMaster; South Carolina Executive order 2021 State of Emergency which addresses the duties and responsibilities of any and all State Agencies deal with extraordinary Circumstances

Issue Six

The Department of Correction has failed to provide proper care and protection related to Covid-19 due to overcrowding and short of staff. Also no policy was made in S.C. DC. Due to short of staff and overcrowded.

Issue Seven

This is miscarriage of justice because I'm a inmate learning law. Blackstone Law

Rule 8(f) Construction of Pleading

S.C. Const. Art 5 section 9

Rule 81

S.C. Const. Art 1 section 2 and due process and equal protection of Law

Complete - preemption doctrine

U.S Art 2 section 3

I will pray that God will be done; in this matter under these extraordinary circumstances, I will pray that God deliver me and that Honorable judge, grant this motion to be review, to All judge in the Court OF Appeal.

Jamie Jay

State of South Carolina
In the Court of Appeal

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Appeal From Horry County
Honorable R. Ferrell Cothran Jr
Honorable William H Seal Jr
Honorable H Bruce Williams
Honorable John D. Geathers
Appeal Case No 2021-001277

JUN 26 2023

SC Court of Appeals

Jamie Goss

Appellant

VS

The State

Respondent

Proof of Service

I Jamie Goss certify that I have served the motion to ~~amend~~ ~~amend~~ ~~amend~~ 59(e) and 60(a) I respond to order filed June 9 2023 on Respondent by depositing a copy in the US Mail addressed to Office of Attorney General Post Office Box 11549 Columbia, South Carolina 29211 Alan McCrory Wilson William M. Blich Jr Jimmy A Richardson

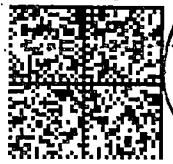
Jamie Cross 294885
Ridgeland Correctional Inst
P.O Box 2039
Ridgeland SC 29936

RIDGELAND CORRECTIONAL
INSTITUTION

JUN 15 2023

Mailroom

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Honorable William Bruce Chief
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SC Court of Appeals

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